

ORIGINAL
(Rev. 5/05)FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE(1) BLANE A. CORNISH, 158491
(Name of Plaintiff) (Inmate Number)P.O. Box 9561, Wilmington, DE 19809
(Complete Address with zip code)(2) _____
(Name of Plaintiff) (Inmate Number)1:07-cv-761-JJF

(Case Number)

(to be assigned by U.S. District Court)

(Complete Address with zip code)(Each named party must be listed, and all names
must be printed or typed. Use additional sheets if needed)

vs.

(1) GEORGE DAUDY (Civilevic)
(2) FRANK COSTON (Civilevic)
(3) DOUG PETTIFORD (Civilevic)
(Names of Defendants)(Each named party must be listed, and all names
must be printed or typed. Use additional sheets if needed)

I. PREVIOUS LAWSUITS

- A. If you have filed any other lawsuits in federal court while a prisoner, please list the case number including year, as well as the name of the judicial officer to whom it was assigned:

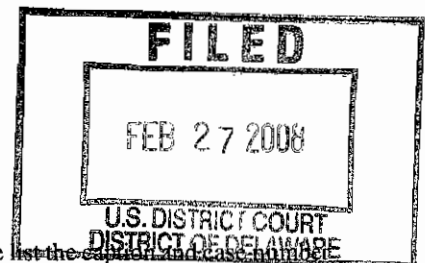
N/A

AMENDED

CIVIL COMPLAINT

X

Jury Trial Requested



FEB 27 2008

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

RD scanned

NAME OF defendants

4. ELAINE LANCASTER, (CIVILGENIC INC.)

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? • Yes • • No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? • Yes • • No
- C. If your answer to "B" is Yes:
1. What steps did you take? IN The Therapeutic Community we have formal complaints. which I did file.
 2. What was the result? AS of this date the Director and Supervisor has come to me to try to resolve this matter.
- D. If your answer to "B" is No, explain why not: _____

III. DEFENDANTS (in order listed on the caption)

(1) Name of first defendant: George DANDY
 Employed as Director (Civigenics) at Civigenics Key North
 Mailing address with zip code: 300 Water St. Dover De 19904.

(2) Name of second defendant: Frank Coston
 Employed as Supervisor at Civigenics Key North
 Mailing address with zip code: 300 Water St. Dover De 19904.

(3) Name of third defendant: Doug Pettiford
 Employed as TC at Civigenics Key North
 Mailing address with zip code: 300 Water St. Dover De 19904.

(List any additional defendants, their employment, and addresses with zip codes, on extra sheets if necessary)

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List of additional dependents, their employment and addresses
with zip codes, on this extra sheet.

NAME ELAINE LANCASTER

Employed as: Counselor at CIVIC GEM KEY NORTH.

Mailing address with zip code: 300 WATER ST. DOVER DE 19904

STATE OF CLAIM

Director GEORGE DAUDY
of the CiviGenic KEY NORTH
program.

1

Director GEORGE DAUDY was responsible for making sure that the environment of the CiviGenic KEY NORTH DRUG program was a physically safe environment for me and other community members. Mr. DAUDY failed to do so after he as CiviGenic IUG, allowed me to be punched in the right eye and suffer damage, by a community member NAME SEAN DAVIS. Who punched me in my eye for having a job position in the program as coord. Expenditor. Mr. DAUDY and CiviGenic IUG neglected me a physically safe environment when he and CiviGenic IUG made a choice to allow SEAN DAVIS back in to the CiviGenic KEY NORTH program after he was discharge from the program on or about 3-21-07, for refusing to following program rule. He was sent to 1-E-01-E, which is a pod for punishing people. THRU on or about 4-2-07, Mr. SEAN DAVIS was brought back to the CiviGenic KEY NORTH DRUG program as excepted back in to the program, And the CiviGenic KEY NORTH program and Director DAUDY should have known about Mr. SEAN DAVIS problem with not following program rule's, this is were my physically safe environment was neglected by Director DAUDY. THRU on or about 8-21-07, SEAN DAVIS punch me in my eye caused injury to my eye that has craked the vitreous part of my eye and cause me to have eye problems that I didn't have prior to being place in to the CiviGenic KEY NORTH program. Now I'm seeing a eye specialist for my injury.

STATE OF CLAIM
FRANK COSTON, SUPERVISOR
CIVI GENIC INC. KEY NORTH program

2

Supervisor, FRANK COSTON was responsible for making sure that the environment of the CIVI GENIC KEY NORTH DRUG program was a physically safe environment for me and other community members. Mr. COSTON failed to do so after he on CIVI GENIC INC. allowed me to be punched in my right eye by a community member NAME SEAN DAVIS who was discharged from the CIVI GENIC program on or about 3-21-07 because he didn't want to comply to CIVI GENIC program rules. And was sent to I-E or E, which is a pod for punishment. And then was brought back to the CIVI GENIC program on or about 4-2-07 and then on or about 8-21-07 SEAN DAVIS punched me in my eye and now I have a cracked vitreous and other problems with my eye that are causing me to see a ^(eye) specialist. IF Mr. COSTON on the CIVI GENIC INC. had reviewed Mr. DAVIS re-entry in to the program after his discharge, my eye and my physical safety would not have been taken away. The staff, Mr. COSTON made a decision to allow Mr. DAVIS back in to the CIVI GENIC KEY NORTH program, which in turn was a result of my injury to my eye.

~~STATE OF CLAIM~~
Doug Pettiford (FC)
CiviGENIC INC KEY NORTH program

#3

Doug Pettiford, CiviGENIC INC, was responsible for making sure that the CiviGENIC KEY NORTH DRUG program is a physically safe environment for myself and other community members. THE company failed to do so because I was punched in my right eye way'll I was sitting down in a chair by another community member. BECAUSE I held a position in the program called Coor, Expeditor. THE expeditors are the ear and the eyes of the community that monitor all attitude's and behaviors of community members. So this position that I held job detail me to write the community members up for there negative attitude's and behaviors, This caused the community ^(members) to become upset, some of them and it's result was me having my eye injured. These position are given to community members like myself by staff and other community members in higher positions. I am going to see a eye specialist because my eyes has been hurt very bad. Before I enter this CiviGENIC program my eye's were very good, NOW my vision is poor and I have a craked vitreous and bubble's coming an going in my right eye NOW. THE CiviGENIC, INC should have had some sort of protection for me and other community member to prevent other community members from hurting them, my safety was at risk, and in turn I was injured.

Amended

IV. STATEMENT OF CLAIM

(State as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets of paper if necessary.)

1. All defendants are involved because there are responsible for making sure my patient's rights aren't violated. On or about January 10, 2008 I was called from what I was doing to our housing area close to the Key arena.
2. And I saw a (inmate) community member sitting at a folding table going through a table full of community members files. Myself and other community members witness this and another person that was
3. a community member. This community member was going through other community members files while sitting in front of a counselor cubicle with a counselor sitting in the cubicle doing some other work with papers.

V. RELIEF

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. I want compensatory damages for violating my patient's rights and my confidentiality drug abuse patients records, And for taking away my right to a safe environment

2. I want to have the Company Civic
Genie apologize to me for allowing
my records to be reviewed by others
community member.
3. And I want compensatory damages for
damages done to my eye and all
medical bills paid for glass's and contacts
that I would need for my eye.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 22 day of February, 2008.

Bilene A. Cornish
(Signature of Plaintiff 1)

(Signature of Plaintiff 2)

(Signature of Plaintiff 3)